

EXHIBIT 5

David Squire's Deposition Transcript

David Squire
04/05/2019

1 STATES DISTRICT COURT
2 FOR THE EASTERN DISTRICT OF MICHIGAN
3 SOUTHERN DIVISION
4

5 TEOKA S. WILLIAMS,
6 Plaintiff,

7 -vs- Civil Action

8 No. 2:18-cv-12522-VAR-MKM
9

10 BEAUMONT HEALTH,
11 Defendant.

12 _____/

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15 The Deposition of DAVID SQUIRE,
16 Taken at 19th District Court
17 16077 Michigan Avenue
18 Dearborn, Michigan,
19 Commencing at 12:00 p.m.,
20 Friday, April 5, 2019,
21 Before Michelle C. Vining, CSR 2335, RPR
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1 specifically ask you to read the last paragraph and see
2 if that refreshes your recollection.

3 A. Yes, I'm just saying I don't recall the conversation. I
4 don't disagree with the minutes for the meeting, no.

5 Q. Looking at the minutes, does that refresh your
6 recollection that Teoka had said at the meeting that the
7 patient stated that she didn't want a black bitch to be
8 her R.N.?

9 A. She must have or it wouldn't have been in the minutes.

10 Like I said, I have no dispute with the
11 content. I'm just saying that I can't recall the
12 conversation.

13 Q. But you do recall generally that Teoka expressed concern
14 that a patient had requested that she not be her
15 nurse --

16 A. Yes.

17 Q. -- based on race?

18 A. Yes.

19 Q. You'd agree that if a patient said she didn't want a
20 black bitch to be her nurse, that would be racial in
21 nature?

22 A. I would agree, yes.

23 Q. So at that time being the director of human resources,
24 was there any policy that you're aware of at Beaumont
25 Health that specifically addressed the circumstance for

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1 where a patient makes a request for care based on race?

2 A. I don't believe there's a policy in place.

3 Q. I assume before today's date, that has been something
4 that you've been asked to look into?

5 A. It wouldn't fall under the human resources side. In HR
6 we deal with -- if Teoka was misbehaving with a patient,
7 we would be actively involved. If the patient is
8 misbehaving with Teoka, that would fall under the unit's
9 responsibility and our guest relations department.

10 Q. Understanding it might fall under guest relations,
11 certainly if there's a policy regarding employees being
12 assigned or taken off care for a patient based on race,
13 you would likely know about it, correct?

14 A. Yes, I have some knowledge of it, yes. Not --

15 Q. But sitting here today, you're not aware of any policy,
16 written policy at Beaumont Health that addresses that,
17 are you?

18 A. I'm not aware of a policy.

19 Q. Are you aware of any written policy, guideline, memo,
20 anything at all that Beaumont Health has issued that
21 touches on this topic?

22 A. I am not.

23 Q. In the last four and a half years, other than Teoka,
24 have you become aware of any other situation where a
25 patient has requested care, based on race?